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TRW

TRW Inc.

Executive Offices
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Cleveland, OH 44124-3760

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11 September 2001

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Mr. Arthur C. Heath, Ph.D.
Section Chief
California Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, California 90013

SITE CLOSURE
THE MONADNOCK COMPANY
18301 ARENTH AVENUE
CITY OF INDUSTRY, CALIFORNIA

Dear Mr. Heath:

In support of our request for onsite groundwater closure, TRW Inc. (TRW) is pleased to provide the enclosed reports entitled "Semiannual Groundwater Monitoring Report for July 2001" and "Groundwater Extraction and Treatment System Performance" for the Monadnock Company site in City of Industry, California. Pursuant to our ongoing discussions and correspondence with you regarding the subject site, TRW requests written confirmation that we have satisfied all requirements for site closure and that no further groundwater remedial action or monitoring is required at the site.

TRW has conducted soil and groundwater remediation activities at the Monadnock site since the late 1980s. Soil remediation activities included the excavation of several hundred cubic yards of soil impacted with volatile organic compounds (VOCs) from 1987 to 1989, followed by the operation of a soil vapor extraction system in 1993. In a letter from the Regional Water Quality Control Board, Los Angeles Region (LARWQCB) dated 6 May 1994, your staff indicated that impacted soil at the site had been remediated to allowable levels and that soil remediation at the site was complete. A groundwater extraction and treatment system was subsequently operated onsite from late 1995 until June 1998. A summary of the groundwater system design, operation, and performance is provided in the enclosed report entitled "Groundwater Extraction and Treatment System Performance," previously submitted in 1999, and updated to include recent site monitoring data.

TRW initially requested site groundwater closure in September 1999 because VOC concentrations onsite had reached stable levels. The LARWQCB responded in a letter dated 22 October 1999, indicating that closure could not be granted until TRW collected two additional quarters of monitoring data to demonstrate that stabilization and declining VOC levels would continue without further active treatment. In addition, TRW was directed to test for emergent chemicals including perchlorate, 1,4-dioxane, and N-nitrosodimethylamine.

TRW conducted the requested two additional quarters of groundwater monitoring in November 1999 and April 2000. In a letter dated 12 July 2000, the LARWQCB stated "the results of these sampling events documented that VOC concentrations continued to remain stable, near the lowest levels historically recorded, in the absence of active treatment." However, the results also indicated the presence of 1,4-dioxane, a compound for which there was no historic concentration data because it had not been previously analyzed at the site. The LARWQCB therefore directed TRW to continue groundwater monitoring for one additional year to determine the trend in 1,4-dioxane concentrations, and stated that at the completion of this program they would reconsider TRW's request for onsite groundwater closure.

TRW completed the additional year of monitoring requested by your staff in July 2001, and has submitted the results in two prior semiannual reports (October 2000 and May 2001), as well as the enclosed semiannual report dated August 2001. The results demonstrate that VOC concentrations continue to remain at stable or declining levels. Furthermore, 1,4-dioxane has also demonstrated a declining concentration trend onsite and has remained at stable levels offsite since its detection in 1999. Note that the 1,4-dioxane concentration onsite in July 2001 (13 µg/l in MW-2) is well below 10 times the California Department of Health Services (DOHS) action level (3 µg/l), and the maximum concentration offsite (37 µg/l in MW-12) is only slightly above 10 times the DOHS action level. The EPA's Interim Record of Decision for the Puente Valley Operable Unit establishes the Performance Criterion for the Shallow Zone (water table to 150 feet below ground surface) as 10 times the Federal or State maximum contaminant levels. The concentration in the deepest monitored interval onsite (77 to 97 feet in well MW-11) is at a nondetectable level.

The enclosed reports, which provide historic monitoring results and the groundwater treatment system performance data, demonstrate that the requirements of the LARWQCB for this site have been satisfied with regard to onsite groundwater contamination. Any offsite impact to groundwater associated with this site will be addressed as part of the regional remedy for the Puente Valley Operable Unit.

Given the fact that TRW has fully satisfied all requirements specified by the LARWQCB for onsite groundwater closure, we respectfully request your concurrence and your written confirmation of closure of this site. We are prepared to provide detailed discussion regarding the supporting data contained in the two enclosed documents during the meeting we have scheduled with you on 27 September 2001 at 9:30 a.m. at your office. If you have any questions regarding the enclosed documents or would like to further discuss site conditions before our meeting, please do not hesitate to contact me at (216) 291-7752.

Sincerely,

Joseph P. Kwan
Director, Environmental Remediation

cc: Angelica Castaneda, LARWQCB